



## Department of Energy

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Fernald Area Office

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JUN 29 1998  
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Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Schneider:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT ISSUES -  
INITIATION OF OPERATION OF NEW WASTE WATER SOURCES - FERNALD  
ENVIRONMENTAL MANAGEMENT PROJECT**

The Fernald Environmental Management Project (FEMP) is scheduled to bring several new waste water sources on line in accordance with our remedial objectives. The National Pollutant Discharge Elimination System (NPDES) Permit Application of September 22, 1997, identified four new waste water discharges. These sources, applicable regulatory milestones, and planned start-up dates are the following:

| SOURCE   | REGULATORY MILESTONE | DRIVER   | PLANNED STARTUP DATE |
|--|----------------------|--|----------------------|
| On-Site Disposal Facility (OSDF) Leachate*               | None                 | None   | June 1998            |
| Southern Waste Units (SWU) storm water system effluent** | None                 | None   | June 1998            |
| South Field Extraction                                   | August 1, 1998       | Operable Unit 5 (OU5) Remedial Action Work Plan (RAWP) | July 1998            |
| South Plume Optimization                                 | September 1, 1998    | OU5 RAWP   | August 1998          |

\* The leachate system began operation in December 1997 collecting runoff/leachate from impacted material. The runoff/leachate from this material was already being collected in the site storm sewer system as part of the Area 1 Phase I project. The runoff/leachate identified here would be from sources not currently contributing to the Waste Water Treatment System (WWTS).

**\*\* A2P1 Integrated Remedial Design Package (IRDP) has yet to be approved. The system began operating in June 1998. The new discharge described here would be storm water management coinciding with actual waste unit excavation.**

**Fluor Daniel Fernald (FDF) submitted an NPDES Permit Renewal Application on September 22, 1997, to both renew the existing permit and to reflect the above new discharges. This permit application was submitted in the required timely manner - namely 180 days before permit expiration and 180 days before initiation of new discharges.**

**To date, the new FEMP NPDES Permit has not been issued. The existing permit expired March 31, 1998. Under the terms and conditions of the existing permit, existing discharges can continue under an expired permit provided that a complete renewal application was submitted in a timely manner. For new discharges, a complete application is required at a minimum of 180 days before planned start-up. The submission of the NPDES Permit Application on September 22, 1997, satisfies this requirement for new discharges.**

**The Ohio Environmental Protection Agency (OEPA) Division of Surface Water indicates that the draft permit issued for public notice from the Columbus office could potentially occur on July 15, 1998, at the earliest. Given a 30-day public notice period and assuming no adverse public comment, the new permit would be issued August 15, 1998.**

**The FEMP intends to initiate operation of these new sources ahead of the NPDES permit being issued. This intent is supported by the following:**

- **All anticipated WWTSSs envisioned to manage these new waste water discharges are in place and functioning as described in the NPDES Permit Application.**
- **OSDF leachate is discharged to the Advanced Waste Water Treatment (AWWT) Phase II System and is only one component of the combined waste water stream from this system. The NPDES Permit Application basis did not seek to increase the flow from AWWT Phase II but only sought to better reflect the contributing waste water sources.**
- **SWU storm water is discharged to the existing Storm Water Retention Basin (SWRB) via the SWU storm water collection system. Under normal operation, the SWRB is discharged to AWWT Phase I for treatment. The permitting basis described in the NPDES Permit Application only sought to maintain the SWRB design hydraulic capacity. Similar to OSDF leachate, the basis did not seek to increase the flow but only sought to better reflect the contributing storm water sources managed by the SWRB and AWWT Phase I.**
- **New ground water sources do represent a significant increase in the total flow to be discharged to the Great Miami River (GMR). The current permit is based on 2.775 Million Gallons per Day (MGD). The additional groundwater sources will result in**

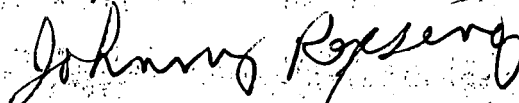
4.935 MGD in July 1998 and 5.655 MGD in August 1998. An 1800 gallon per minute design capacity expansion of the AWWT facility was constructed to address this increased flow. That facility became operational in April 1998. Accordingly, the FEMP believes that the opportunity to accelerate the operation of these ground water systems better serves the environment through accelerating the ground water remediation remedy.

- While the FEMP recognizes the draft NPDES Permit Support Document is subject to change, and a thorough review of the entire draft NPDES Permit will be conducted once issued, the FEMP believes that compliance with the proposed limitations is achievable. It does not appear that any treatment system adjustments, expansions, etc. will be required to achieve these proposed limitations.

The FEMP intends to proceed with our current plans to initiate these discharges absent directions to the contrary from OEPA.

If you have any questions concerning this request, please contact John Kappa at (513) 648-3149, or Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Kappa

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